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Via ECF

July 10, 2025

United States District Court
Eastern District of New York
Honorable James R. Cho
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Fidan, et al. v. Istanbul Rego Park Inc., et al.*
Case No. 22-CV-2252 (ENV) (SJB)

Dear Judge Cho:

Our office represents Plaintiffs Ali Fidan and Ece Karagoz (collectively, “Plaintiffs”) in the above-referenced matter.

On May 28, 2025, the parties appeared before Your Honor for an in-person status conference. As Your Honor recalls, at the Conference, the parties agreed to submit a revised settlement agreement in accordance with Court’s guidance for Cheeks approval.

On June 2, 2025, Plaintiffs sent Defendants a revised version of the Settlement Agreement in accordance with the Court’s April 22, 2025 Order. Defendants requested a redline, which Plaintiffs promptly provided, noting that the requested language was removed from Paragraph 5 and the Recitals. In the weeks that followed, Plaintiffs sent multiple reminders, on June 17, June 20, June 26, and again on July 7, seeking the executed agreement so that Plaintiffs’ could sign and the agreement could be submitted to the Court. Defendants acknowledged on June 20 that their clients had not signed the agreement due to coordination difficulties, and requested an extension, which Plaintiffs did not oppose. Defendants further indicated on June 26 that they had not yet received a response from their clients.

To date, Plaintiffs have not received a fully executed version of the agreement from Defendants for Plaintiffs to sign, preventing finalization and submission of the agreement in accordance with the Court’s directives.

Accordingly, Plaintiffs respectfully request that the Court set a firm deadline of this coming Monday, July 14, 2025, for Defendants to return a fully executed version of the Settlement Agreement to Plaintiffs so that it may be signed and submitted to the Court. Should Defendants fail to comply with this deadline, Plaintiffs respectfully request that the Court enter judgment in accordance with the terms of the settlement agreement previously provided to Defendants.

Thank you very much for your time and consideration.

Akin & Salaman PLLC
/s/ Hakan Sen
Hakan Sen